

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

DONNA JOHANSEN CROSS, <i>et al.</i>)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No.: 1:12cv1455
)	
PROSPECT MORTGAGE, LLC, <i>et al.</i>)	
)	
Defendants.)	

**CONSENT MOTION FOR A SINGLE HEARING ON THE PARTIES' MOTIONS FOR
SUMMARY JUDGMENT**

Plaintiffs, Donna Johansen Cross and David Cross ("Plaintiffs"), by counsel, Defendant, Prospect Mortgage, LLC ("Prospect"), by counsel, and Defendant American Portfolio Mortgage Corp. ("American"), by counsel, respectfully move that the Court set 10:00 a.m. on October 4, 2013, or, in the alternative, 10:00 a.m. on October 11, 2013, as the hearing date for the following motions: (1) Plaintiffs' Motion for Partial Summary Judgment (Dkt. 80) that is currently noticed for a hearing at 10:00 a.m. on October 4, 2013; (2) Prospect Mortgage, LLC's Motion for Summary Judgment (Dkt. 87) that is currently noticed for a hearing at 10:00 a.m. on October 11, 2013; and (3) Defendant, American Portfolio Mortgage Corp's Motion for Summary Judgment (Dkt. 83) that is currently noticed for a hearing at 10:00 a.m. on October 11, 2013, on the grounds set forth in the accompanying Memorandum in Support of Consent Motion for a Single Hearing on the Parties' Motions for Summary Judgment.

PROSPECT MORTGAGE, LLC

By: /s/ Robert D. Perrow
Robert D. Perrow (VSB No. 14766)
J.P. McGuire Boyd, Jr. (VSB No. 72753)
WILLIAMS MULLEN, PC
P. O. Box 1320 (23218-1320)
200 South 10th St., Suite 1600
Richmond, VA 23219
Facsimile: 804.420.6507
Telephone: 804.420.6927
Email: bperrow@williamsmullen.com
Email: mboyd@williamsmullen.com

By: /s/ James G. Smalley
Cyron & Miller LLP
100 N Pitt Street, Suite 200
Alexandria, VA 22314-3134
Telephone: 703.299.0600
Email: jsmalley@cyronmiller.com

By: /s/ Thomas D. Domonoske
Thomas E. Domonoske, Attorney at Law
461 Lee Avenue
Harrisonburg, VA 22802
Telephone: 540.442.7706
Email: tomdomonoske@earthlink.net

By: /s/ Dale W. Pittman
The Law Office of Dale W. Pittman, P.C.
112-A W. Tabb Street
Petersburg, VA 23803
Telephone: 804.861.6000
Email: dale@pittmanlawoffice.com

By: /s/ F. Peter Silva, II
1325 G Street NW, Suite 500
Washington, DC 20005
Telephone: 202.380.9355
Email: Silva@gowengroup.com

.

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of September, 2013, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Thomas D. Domonoske, Esq.
Thomas D. Domonoske, Attorney at Law
461 Lee Ave.
Harrisonburg, VA 22802
Telephone: 540.442.7706
tomdomonoske@earthlink.net

Dale W. Pittman, Esq.
The Law Office of Dale W. Pittman, P.C.
112-A W. Tabb St.
Petersburg, VA 23803
Telephone: 804.861.6000
dale@pittmanlawoffice.com
Karen@pittmanlawoffice.com

F. Peter Silva, II, Esq.
1325 G Street NW, Ste. 500
Washington, D.C. 20005
Telephone: 202.380.9355
Peter.Silva@gowengroup.com
Counsel for Plaintiffs

Matthew Allan Ranck, Esq.
Elias George Saboura-Polkovotsy, Esq.
Eccleston and Wolf PC
7240 Parkway Dr., 4th Fl.
Hanover, MD 21076
Telephone: 410.752.7474
Email: ranck@ewdc.com
Email: saboura@ewva.com
Counsel for Saratoga Title and Escrow, Inc.

James G. Smalley, Esq.
Cyron & Miller LLP
100 N Pitt St. Ste. 200
Alexandria, VA 22314-3134
Telephone: 703.299.0600
Email: jsmalley@cyronmiller.com
Counsel for American Portfolio Mortgage Corp

By: /s/ Robert D. Perrow
Robert D. Perrow (VSB No. 14766)
J.P. McGuire Boyd, Jr. (VSB No. 72753)
WILLIAMS MULLEN, PC
P. O. Box 1320 (23218-1320)
200 South 10th St., Suite 1600
Richmond, VA 23219
Facsimile: 804.420.6507
Telephone: 804.420.6927
Email: bperrow@williamsmullen.com
Email: mboyd@williamsmullen.com